

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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ALPHONSE MAZZARELLA, *et al.*

v.

FAST RIG SUPPORT, LLC, *et al.*

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**STIPULATION AND PROPOSED ORDER**

The parties **STIPULATE AND AGREE** as follows:

1. Upon the Court's entry of this stipulated order, Winebrake & Santillo, LLC ("W&S") will be permitted to remove from its trust account the \$19,000.00 referenced in paragraph 2 of the Court's October 21, 2016 Order (Doc. 101).

2. On or before December 23, 2016, Defendants FAST Rig Support, LLC and First Americans Shipping and Trucking, Inc. ("Defendants") will deliver to W&S a check in the amount of \$25,000.00 and payable to "Winebrake & Santillo, LLC." Thereafter, Defendants will pay an additional \$90,000.00 to W&S pursuant to the following schedule: (i) Defendants will pay \$12,858.00 to W&S by March 31, 2017; (ii) Defendants will pay \$12,857.00 to W&S by June 30, 2017; (iii) Defendants will pay \$12,857.00 to W&S by September 30, 2017; (iv) Defendants will pay \$12,857.00 to W&S by December 22, 2017; (v) Defendants will pay \$12,857.00 to W&S by March 30, 2018; (vi) Defendants will pay \$12,857.00 to W&S by June 30, 2018; and (vii) Defendants will pay \$12,857.00 to W&S by September 30, 2018. Defendants are jointly and severally responsible for making the above payments. Moreover, Defendants' payment obligations

and W&S's entitlement to such payments will be assumed by any successor entities or individuals.

3. Upon paying the total of \$115,000.00 to W&S pursuant to paragraph 2 above, Defendants will have fully satisfied the July 19, 2016 Amended Judgment (Doc. 95) entered by the Court against Defendants and in favor of W&S.

4. Defendants' "Motion for Relief from Judgment Granting Plaintiff Attorney's Fees and Costs" (Doc. 99) is **DENIED AS MOOT**.

5. Although this action will remain **CLOSED**, the Court retains jurisdiction for purposes of enforcing the obligation of Defendants or any successors to satisfy their payment obligations under this stipulated order.

**AGREED** this 5th day of December, 2016:

**FOR PLAINTIFFS AND PLAINTIFFS' COUNSEL:** **FOR DEFENDANTS:**



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**SO ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2016.

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MALACHY E. MANNION  
United States District Judge